

EXHIBIT L -
Defendants' Response to
Plaintiff's Fifth Set of
Interrogatories

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

KEVIN CAMPBELL,

Plaintiff,

DEFENDANTS FEDERAL
EXPRESS CORPORATION AND
ERIC WANDERS'
RESPONSES TO PLAINTIFF
FIFTH SET OF
INTERROGATORIES

-against-

FEDERAL EXPRESS CORPORATION a/k/a
FEDEX EXPRESS, and ERIC WANDERS,
INDIVIDUALLY,

Civil Action No. 22-cv-7662

Defendants.

-----X

Defendants Federal Express Corporation and Eric Warnders, by and through undersigned counsel, and pursuant to Rule 33 of the Federal Rules of Civil Procedure, serve their responses and objections to Plaintiff's Fifth Set of Interrogatories.

PRELIMINARY STATEMENT

Defendants have not fully completed its investigation of the facts related to this case, have not yet fully completed their discovery in this action, and have not yet completed their trial preparation. All of the responses contained herein are based only upon such information and documents as are presently available to and specifically known to Defendants at the present time. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts or documents, add meaning to the known facts or documents, and/or establish entirely new factual and legal conclusions, all of which may lead to substantial additions to, changes in and/or variations from the information and documents herein set forth.

The following responses are given without prejudice to Defendants' right to produce any subsequently discovered fact(s) or document(s) that they may later recall, learn about or locate. Accordingly, Defendants reserve the right (but specifically denies any obligation) to change any and all responses herein as additional facts or documents are ascertained, analyses are made, legal research is completed, and contentions are made.

GENERAL OBJECTIONS

In addition to the objections specifically raised herein, each response and any documents produced pursuant to these requests are subject to all objections that would require the exclusion of any such response and/or document at trial, all of which objections and grounds therefore are reserved and may be interposed at the time of trial.

The following responses are based upon information presently available to FedEx and, except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that Defendants have responded to all, or part of any request is not intended, and shall not be construed, to be a waiver by Defendants of all or any part of any objections to any request.

1. Defendants object to Plaintiff's Interrogatories to the extent they seek information protected against disclosure by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or immunity from disclosure.

2. Defendants have not completed its investigation or preparation for the trial of this matter. Accordingly, these responses are provided without prejudice to Defendants' right to make objections and present additional information, which is hereafter discovered, or which discovery and investigation indicates is relevant to this action and called for by these Interrogatories.

3. Defendants reserve all rights to object as to the relevance, materiality, and admissibility of the responses sought pursuant to Plaintiff's Interrogatories.

4. Defendants object to the Interrogatories to the extent that they impose duties on behalf of, or seek information within the possession, custody, or control of individuals or legal entities other than Defendants.

5 These General Objections are applicable to each and every one of the following responses, and objections and failure to repeat an objection in response to a specific Interrogatory for production shall not be deemed a waiver of these General Objections

INTERROGATORIES

INTERROGATORY NO. 25: Provide the name, email address, phone number, and mailing address of the person depicted filming the videos produced at Plaintiff's Production Number 69-75.

RESPONSE: Defendants object to Interrogatory No. 25 because it is vague and overbroad and because the person who appears to be filming the videos produced as Plaintiff's Production Number 69-75 is no longer employed with FedEx. Subject to and without waiving these objections, the person that appears to be filming the videos produced as Plaintiff's Production Number 69-75 is Steve Blaise. Mr. Blaise's last known contact information is as follows:

1014 E 82nd Street
Brooklyn, New York 11236
(929) 372-9222 and (718) 513-3399

Respectfully submitted,

/s/ Gabriel McGaha
Gabriel McGaha (TN #027413)
FEDERAL EXPRESS CORPORATION
3620 Hacks Cross Rd, Bldg. B, 3rd Floor
Memphis, Tennessee 38125
Telephone: (901) 434-3131
Facsimile: (901) 434-9279
gabriel.mcgaha@fedex.com

*Attorney for Defendants Federal Express
Corporation and Eric Warnders*

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Defendants' Responses to Plaintiff's Fifth Set of Interrogatories upon the following via U.S. Mail postage, pre-paid on this 18th day of February 2024.

/s/ Gabriel McGaha _____

Gabriel P. McGaha

VERIFICATION OF INTERROGATORY RESPONSES

I, Eric J Warnders, hereby attest that during the relevant time-period, I was Senior Managers Ops/AAA at Federal Express Corporation I have read the statements contained in Defendants' Responses to Plaintiff's Third, Fourth, and Fifth Set of Interrogatories and believe, based on a reasonable inquiry, and under penalty of perjury, that the answers contained therein are true and correct to the best of my knowledge, information, and belief.

Name: Eric Warnders
/s/ 
Title: Sr. Mgr
Date: 3/19/24